

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SABA MAHMOOD, individually and on
behalf of all similarly situated
individuals,

Plaintiff,

v.

BERBIX INC., a Delaware corporation,

Defendant.

Case No. 1:22-cv-02456

**DEFENDANT BERBIX INC.'S
UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

Defendant Berbix Inc. (“Berbix”) hereby moves to extend its deadline to answer or otherwise respond to the complaint (ECF No. 1, Ex. 1) until June 10, 2022. In support of its unopposed motion, Berbix states as follows.

1. Berbix was served with a copy of the complaint and summons on April 7, 2022.
2. Berbix removed this case under 28 U.S.C. § 1446(b)(1) on May 9, 2022.
3. Under Federal Rule of Civil Procedure 81(c)(2)(C), the current deadline for Berbix to answer or otherwise respond to the complaint is May 16, 2022.
4. Berbix recently retained counsel in this case and is currently reviewing the allegations in the complaint. Berbix respectfully requests an extension of time to June 10, 2022 to answer or otherwise respond to the complaint.
5. This unopposed motion is Berbix’s first request for an extension of time.
6. Counsel for Berbix conferred with Plaintiff’s counsel on May 3, 2022 and May 9, 2022, regarding this request for an extension through June 10, 2022. Plaintiff does not oppose this

request.

7. Berbix respectfully requests that the Court extend its deadline to respond the Complaint to June 10, 2022.

Dated: May 10, 2022

Respectfully submitted,

DEFENDANT BERBIX INC.

By: /s/ Robert E. Earles
Robert E. Earles
By Its Attorneys

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